

STATE OF LOUISIANA

OFFICE OF THE CLERK OF COURT

PARISH OF CALCASIEU

FOURTEENTH JUDICIAL DISTRICT

I HEREBY CERTIFY, that the above and foregoing is a true and correct copy
of the:

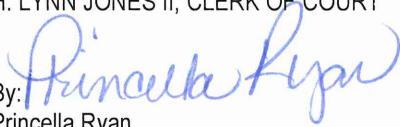
ENTIRE PROCEEDINGS

filed in civil suit entitled WILLIAM Langley versus BERKSHIRE HATHWAY DIRECT INSURANCE COMPANY,
ET AL consisting of twenty-five (25) pages, the original of which documents are on file in our office and bearing
number 2021-4149 Division "D" the Civil Docket of the above Styled Court.

IN TESTIMONY WHEREOF, witness my official signature and seal of office at
Lake Charles, Louisiana, on this 6th day of December A.D. 2021.

H. LYNN JONES II, CLERK OF COURT

By:
Princella Ryan
Deputy Clerk



WILLIAM LANGLEY

VS NO. 2021-4149 DBERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY,
FAST LANE LOGISTICS and
KEITH TERRELL HOWARDFILED: SEP 28 2021: 14TH JUDICIAL DISTRICT COURT
: PARISH OF CALCASIEU
: STATE OF LOUISIANA: Sarah Boller
DEPUTY CLERK OF COURTPETITION FOR DAMAGESI Conf

The petition of WILLIAM LANGLEY, a resident of the full age of majority, residing in Vinton, Calcasieu Parish, Louisiana, respectfully represents:

1.

CLERK'S OFFICE - CIVIL
SEP 28 2021 BY CLERK'S OFFICE

Made defendants herein are:

- a. **BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY**, a foreign insurance company, authorized to do and doing business in the state of Louisiana, who may be served through its agent for service of legal process, Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 70809;
- b. **FAST LANE LOGISTICS**, a foreign company, who may be served via Louisiana Long-Arm Statute through its agent for service of legal process, Tanya Rodriguez, 55 La Jolla Circle, Montgomery, TX 77356;
- c. **KEITH TERRELL HOWARD**, an individual who may be served via Louisiana Long-Arm Statute at his residence, 3502 Ross Street, Manvel, Texas 77578.

2.

On or about December 10, 2020 at approximately 6:01 a.m., petitioner, WILLIAM LANGLEY, was driving his 2009 Honda CRV eastbound on US 90 in Calcasieu Parish, Louisiana, when a 2012 Freightliner Tractor owned by FAST LANE LOGISTICS and being driven by defendant, KEITH TERRELL HOWARD, westbound on US 90, crossed the center line and struck petitioner's vehicle in the eastbound lane, causing him to run off the road and overturn in a ditch, thereby causing injuries and damages as set forth below.

3.

At the time of the aforesaid collision, defendant, KEITH TERRELL HOWARD, was operating the 2012 Freightliner Tractor in the course and scope of his employment with FAST LANE LOGISTICS, defendant herein. Therefore, FAST LANE LOGISTICS is responsible for the negligence of KEITH TERRELL HOWARD under a theory of respondeat superior.

PROCESSEDDate: OCT 29 2021

Date SEP 28 2021
Check # 1411051
From Borgett M (911)
Amt \$ 100.00
Recd by AL



C M S 7 6 8 8 8 3 8
Filing Date: 09/28/2021 12:00 AM
Case Number: 2021-004149
Document Name: PETITION

Page Count: 4

4.

The aforesaid collision was in no way attributable to the negligence of petitioner, WILLIAM LANGLEY, but on the contrary, was due to the negligence of defendant, KEITH TERRELL HOWARD, whose negligence includes but is not limited to the following:

- a. Failing to keep his vehicle under proper control;
- b. Crossing the center line into oncoming traffic;
- c. Failing to keep a proper lookout;
- d. Failing to see what he should have seen and to do what he should have done;
- e. Driving at an excessive rate of speed under the circumstances;
- f. Failing to properly inspect the 2012 Freightliner Tractor;
- g. Failing to exercise due care and caution under all facts and circumstances.

5.

The aforesaid collision was in no way attributable to the negligence of petitioner, WILLIAM LANGLEY, but on the contrary, was due to the negligence of defendant, FAST LANE LOGISTICS, whose negligence includes but is not limited to the following:

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- a. Failure to properly train and instruct its drivers;
- b. Failure to properly supervise its drivers.
- c. Allowing or failing to prevent its drivers from driving for excessive periods of time without rest.
- d. Failing to obey and failing to insure that its drivers obey laws, ordinances, and regulations regarding operation of its vehicles.

6.

As a result of the collision petitioner, WILLIAM LANGLEY, suffered injuries and damages including, but not limited to, neck pain, back pain, elbow pain, a bloody nose, depression, anxiety and panic attacks.

7.

As a result of the collision and injuries, petitioner, WILLIAM LANGLEY, has and will continue to sustain past, present and future: medical expenses, mental and physical pain and suffering, disability, lost wages, loss of earnings, loss of future earning capacity and loss of enjoyment of life, said injuries entitling petitioner to such damages as are reasonable in the premises.

8.

At the time of the collision, defendant, BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY, had issued and there was in full force and effect a policy of liability insurance in favor of KEITH TERRELL HOWARD, owner of the 2012 Freightliner Tractor, under the terms of which BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY, had agreed to insure and indemnify defendant, KEITH TERRELL HOWARD, against any and all liability arising out of the negligent operation of the 2012 Freightliner Tractor.

9.

Petitioner, WILLIAM LANGLEY, avers that at this time his damages do exceed the jurisdictional amount necessary for a trial by jury and for diversity jurisdiction.

WHEREFORE, petitioner, WILLIAM LANGLEY, prays that defendants, BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY, FAST LANE LOGISTICS and KEITH TERRELL HOWARD, be duly served with a copy of the foregoing petition and cited to appear and answer same, and after the lapse of all legal delays and due proceedings had, that there be judgment herein in favor of petitioner, WILLIAM LANGLEY, and against defendants, BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY, FAST LANE LOGISTICS and KEITH TERRELL HOWARD, for damages as are reasonable in the premises, together with legal interest thereon from the date of judicial demand until paid, and for all costs of these proceedings.

Petitioner further prays for such additional relief as the law, equity and nature of the case may permit.

By His Attorneys,

BAGGETT, McCALL, BURGESS,
WATSON, GAUGHAN & ANDRUS, LLC

BY:

Erin M. Alley
ERIN M. ALLEY #23214
3006 Country Club Road
Post Office Drawer 7820
Lake Charles, Louisiana 70606-7820
Phone: 337-478-8888
Fax: 337-478-8946
Email: ealley@baggettmccall.com

PLEASE SERVE THE FOLLOWING DEFENDANTS:

BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY

through its agent for service of legal process:

Louisiana Secretary of State

8585 Archives Avenue

Baton Rouge, Louisiana 70809

FAST LANE LOGISTICS

who may be served via Louisiana Long-Arm Statute

through its agent for service of legal process:

Tanya Rodriguez

55 La Jolla Circle

Montgomery, TX 77356

KEITH TERRELL HOWARD

who may be served via Louisiana Long-Arm Statute

at his residence:

3502 Ross Street

Manvel, Texas 77578

BAGGETT, McCALL, BURGESS
WATSON & GAUGHAN, L.L.C.



WILLIAM B. BAGGETT

(1929-2015)

WILLIAM BAGGETT JR.

ROGER G. BURGESS

WELLS T. WATSON

JEFFREY T. GAUGHAN

ERIN McCALL ALLEY

CHRISTOPHER C. McCALL

MELISSA SHAW-BROWN

ZITA M. ANDRUS

JAKE D. BUFORD

DOMINIQUE BADON NICHOLSON

September 28, 2021

VIA: HAND-DELIVERY

Honorable Lynn Jones
Clerk of Court
14th Judicial District Court
Calcasieu Parish Courthouse
Lake Charles, Louisiana 70601

RE: William Langley
Vs. No. 2021-4149 D
Berkshire Hathaway Direct Insurance Company,
Fast Lane Logistics and Keith Terrell Howard

Dear Sir:

Enclosed for filing is the original Petition together with our check in the amount of \$600.00 for cost deposit. The duplicate copies of the Petition, Interrogatories and Request for Production are for service on the defendants. We ask that you return a conformed copy to our office and serve the defendants as indicated.

Also enclosed for filing is a Request for Written Notice.

Sincerely,

Erin M. Alley
ERIN M. ALLEY

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EMA/pfl
Enclosure



C M S 7 6 8 8 8 3 5

Filing Date: 09/28/2021 12:00 AM

Page Count: 1

Case Number: 2021-004149

Document Name: LETTER

3006 Country Club Road 70605 • P.O. Drawer 7820 • Lake Charles, LA 70606-7820
(337) 478-8888 • FAX (337) 478-8946 • (800) NEW-CLAIM • www.baggettmccall.com

WILLIAM LANGLEY : 14TH JUDICIAL DISTRICT COURT
VS NO. 2021-4149 D : PARISH OF CALCASIEU
BERKSHIRE HATHAWAY DIRECT : STATE OF LOUISIANA
INSURANCE COMPANY,
FAST LANE LOGISTICS and
KEITH TERRELL HOWARD
FILED: SEP 28 2021 : Sarah Boller
DEPUTY CLERK OF COURT

REQUEST FOR WRITTEN NOTICE
OF ASSIGNMENT AND WRITTEN NOTICE
OF ANY ORDER OR JUDGMENT MADE OR RENDERED

TO: Honorable James R. Andrus
Clerk of Court
14th Judicial District Court
Calcasieu Parish Courthouse
Lake Charles, Louisiana 70601

CALCASIEU CLERK'S OFFICE
SEP 28 2021 04005507

In accordance with the provisions of LSA - C.C.P. 1571 and 1572, you are hereby requested to give the undersigned, as counsel for petitioner, WILLIAM LANGLEY, in the above captioned matter, written notice, by mail, ten (10) days in advance of any date fixed for trial or hearing of the case, whether on exception, rules or the merits thereof.

In accordance with the provisions of LSA - C.C.P. 1914 and 1915, you are hereby additionally requested to send us immediate notice of any order or judgment made or rendered in this case on the entry of such order or judgment.

By His Attorneys,

BAGGETT, McCALL, BURGESS,
WATSON, GAUGHAN & ANDRUS, LLC

BY:

Erin M. Alley
ERIN M. ALLEY #23214
3006 Country Club Road
Post Office Drawer 7820
Lake Charles, Louisiana 70606-7820
Phone: 337-478-8888
Fax: 337-478-8946
Email: ealley@baggettmccall.com



WILLIAM LANGLEY : 14TH JUDICIAL DISTRICT COURT
 VS NO. 2021-4149 D : PARISH OF CALCASIEU
 BERKSHIRE HATHAWAY DIRECT : STATE OF LOUISIANA
 INSURANCE COMPANY,
 FAST LANE LOGISTICS and
 KEITH TERRELL HOWARD
 FILED: SEP 28 2021 : 
 DEPUTY CLERK OF COURT

INTERROGATORIES

TO: BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY,
 FAST LANE LOGISTICS and KEITH TERRELL HOWARD

Plaintiff, WILLIAM LANGLEY, propounds the following interrogatories to defendants,
 BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY, FAST LANE LOGISTICS
 and KEITH TERRELL HOWARD, to be answered under oath within the time limits provided by
 law:


 CALCASIEU CLERK-COURT
 SEP 28 2021 PROB-1575-00

DEFINITIONS

“You” or “Your” includes the above-named defendants and all representatives or other persons acting on behalf of the aforementioned defendants, including, but not limited to defendants’ attorney.

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 “Document” means any printed, typewritten or handwritten instrument of whatever character or the physical expression of any means of storage of information and includes, without limitation, any correspondence, memorandum, agreement, letter, hand or typewritten note, computer printout, computer tape, microfilm, microfiche, tape recording, photograph, motion picture, plat, diagram, survey, voice tapes, recordings, e-mails, any computer communications, or other items of a similar nature, originals and non-identical copies and where original and/or non-identical copies are in existence, a copy of the original and a copy of all non-identical copies.

“Person” or “Persons” includes an actual person, firm, association, organization, partnership, business, trust, corporation or public entity.

“Plaintiff” means the named plaintiff in this lawsuit.

“Vehicle involved in the collision” concerns the vehicle driven by the defendant driver at the time of the collision.

“IDENTIFY” or “IDENTIFICATION” or “IDENTITY” when referring to a person means to state the person’s full name, present or last known address, and if known, present or former employer and job title, and when referring to a document means to give a reasonable description thereof, its date, and the full name and the present or last known address of the person, firm or corporation having possession, custody or control thereof.

INSTRUCTIONS

A. In answering these Interrogatories, you are requested to furnish all information known or available to you regardless of whether this information is possessed directly by you or by your agents, employees, or representatives, or by your attorneys, their agents, employees, or representatives.



- B. If any of these Interrogatories cannot be answered in full, please respond to the extent possible, specifying the reasons for your inability to respond to the remainder and state whatever information, knowledge, or belief you do have concerning the unanswered portion.
- C. If you claim privilege as to any matter requested, please give a detailed description of such privilege to allow plaintiff and the Court to ascertain the viability of the privilege.
- D. Each Interrogatory is of a continuing nature. If, after serving an answer to any Interrogatory, you obtain or become aware of any further information that is responsive to such Interrogatory request, please serve amended answers setting forth such information.

INTERROGATORY NO. 1:

Please identify all persons providing factual information and/or assistance in answering plaintiff's written discovery in this case.

INTERROGATORY NO. 2:

Please identify all persons having knowledge of any discoverable matter. Please see Louisiana Code of Civil Procedure art. 1422 prior to objecting to this interrogatory.

INTERROGATORY NO. 3:

Please identify all parties or non-parties that you will seek to be placed on the verdict sheet or assessed with any comparative fault.

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INTERROGATORY NO. 4:

Please identify each person whom you expect to call as an expert witness at trial and state the subject matter on which the expert is expected to testify and state the substance of the facts to which the expert is expected to testify.

INTERROGATORY NO. 5:

Please identify all experts who you have retained or specially employed in anticipation of litigation or preparation for trial who is not expected to be called as a witness at trial.

INTERROGATORY NO. 6:

Please identify all witnesses you may or will call at the trial of this matter. Also, please give a brief statement of their expected testimony and state their relationship to plaintiffs or defendants, if any.

INTERROGATORY NO. 7:

Please identify all exhibits you may or will introduce at the trial of this matter.

INTERROGATORY NO. 8:

For all parties or non-parties that you contend are at fault as it relates to the allegations of this lawsuit, please identify said party or non-party and give a reasonable explanation of your contentions.

INTERROGATORY NO. 9:

Please identify all witnesses, documents, and facts, which support your affirmative defenses in this litigation.

INTERROGATORY NO. 10:

If you contend that plaintiff was at fault in this litigation, please identify all documents, witnesses, and facts that support your contention.

INTERROGATORY NO. 11:

Please identify all persons you have contacted in the course of investigating this litigation and state whether or not you have taken a statement from said person.

INTERROGATORY NO. 12:

Please identify the contents and the terms of any agreements concerning this case or related to this case entered into by you, whether written or oral, including agreements to cooperate at any stage, agreements concerning indemnity, contribution, sharing, or expenses.

INTERROGATORY NO. 13:

Please identify all causes for plaintiff's injuries or illnesses complained of in this litigation other than the facts as stated in plaintiff's petition.

INTERROGATORY NO. 14:

Do you have any information that plaintiff had any injuries that pre-existed the injuries complained of in this lawsuit and/or do you have any information that plaintiff has other injuries or health complaints other than those complained of in this lawsuit? If so, please give a reasonable description of such information.

INTERROGATORY NO. 15:

Do you have any information that plaintiff was ever arrested, charged, and/or convicted of any criminal offense? If so, please identify each arrest, charge, and/or conviction, including but not limited to dates, times, subject, offense, and outcome.

INTERROGATORY NO. 16:

Please give a reasonable description of all information you have which gives you any reason to believe that there was any defect or failure on the part of the vehicle or any equipment or apparatus attached thereto that may have contributed to the wreck.

INTERROGATORY NO. 17:

Please give a reasonable description of all traffic citations the defendant driver received as a result of the collision by stating the name and location of the court involved, the violations of law charged, and the date, place, and manner or disposition of all such citations.

INTERROGATORY NO. 18:

Please give a reasonable description of all traffic citations the defendant driver has ever received.

INTERROGATORY NO. 19:

Please give a reasonable description of the defendant driver's license at the time of the collision, including the type, restrictions, and whether the license has ever been suspended or revoked.

INTERROGATORY NO. 20:

Please give a description of the defendant driver's occupation and identify his/her employer at the time of the collision.

INTERROGATORY NO. 21:

Please identify all persons who gave you information that is contrary to the information contained in the accident report concerning the collision.

INTERROGATORY NO. 22:

Please identify all witnesses to the collision.

INTERROGATORY NO. 23:

Please identify all persons who had contact with the defendant driver within 24 hours prior to and following the collision.

INTERROGATORY NO. 24:

Please identify all maps, plans, drawings, photographs, videotapes, movies, or other documents that in any way relate to the collision, the plaintiff, the accident scene, how the collision happened, or this case.

INTERROGATORY NO. 25:

Please identify all testing that has been done concerning the facts of the collision, including all accident reconstruction done by any expert witness you have hired.

INTERROGATORY NO. 26:

Please state where the defendant driver had been on the date of the accident and where he/she was going at the time of the collision.

INTERROGATORY NO. 27:

Please state what employment related duties the defendant driver was performing, if any, at the time of the accident and on the day of the accident and state the time that he had begun working that day.

INTERROGATORY NO. 28:

Please give a reasonable description of all insurance that is or may be applicable to this litigation, including the full name of the insurer, the insured, dates of coverage and amounts of coverage. THIS INCLUDES ANY EXCESS OR UMBRELLA POLICIES.

INTERROGATORY NO. 29:

Please give a description of the history of the vehicle involved in the collision, including but not limited to, any known defect, any needed repairs, any scheduled repairs, complete history concerning the repair of the vehicle, all owners of the vehicle, all repair or maintenance shops that have worked on the vehicle, and any entity or person who had general or specific responsibility for repair or upkeep of the vehicle.

INTERROGATORY NO. 30:

Please describe any previous motor vehicle accidents of the defendant driver or the vehicle involved in the collision.

INTERROGATORY NO. 31:

Please give a description of the property damage of the vehicle involved in the collision, including but not limited to, the nature and amount of repairs needed or performed, and identify all entities giving estimates on damage or making repairs.

INTERROGATORY NO. 32:

Please state the whereabouts of the vehicle involved in the collision since the accident that is the subject of this litigation.

INTERROGATORY NO. 33:

Please identify the type and amount of alcohol, sedative, tranquilizer, medicine, pill and/or other drugs consumed by the defendant driver during the 12 hours immediately preceding the accident that is the subject of this litigation.

INTERROGATORY NO. 34:

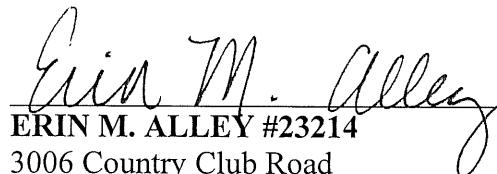
Please identify any and all of the defendant driver's personal and/or company cell phones by cell phone number and service provider of each cell phone. Please state whether the defendant driver was using his/her cell phone at or near the time of the subject accident, including, but not limited to, text messaging, internet usage, and/or any other cell phone usage.

THUS DONE AND SIGNED at Lake Charles, Louisiana this 28th day of September, 2021.

By His Attorneys,

BAGGETT, McCALL, BURGESS,
WATSON, GAUGHAN & ANDRUS, LLC

By:


ERIN M. ALLEY #23214
3006 Country Club Road
P.O. Drawer 7820
Lake Charles, Louisiana 70606-7820
Telephone: 337-478-8888
Facsimile: 337-478-8946
Email: ealley@baggettmccall.com

WILLIAM LANGLEY : 14TH JUDICIAL DISTRICT COURT
VS NO. 2021-4149 D : PARISH OF CALCASIEU
BERKSHIRE HATHAWAY DIRECT : STATE OF LOUISIANA
INSURANCE COMPANY,
FAST LANE LOGISTICS and
KEITH TERRELL HOWARD
FILED: SEP 28 2021 : Sarah Boller
DEPUTY CLERK OF COURT

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY,
FAST LANE LOGISTICS and KEITH TERRELL HOWARD

Plaintiff, WILLIAM LANGLEY, propounds the following requests for production to defendants, BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY, FAST LANE LOGISTICS and KEITH TERRELL HOWARD, who are hereby notified to produce for inspection and copying within the time limits provided by law at the offices of Baggett, McCall, Burgess, Watson, Gaughan & Andrus, 3006 Country Club Road, Lake Charles, Louisiana 70605, the following documents.

These requests are to be answered in accordance with the following definitions and instructions, and these definitions and instructions are hereby incorporated in each of said request as if contained therein.

DEFINITIONS

“You” or “Your” includes the above named defendants and all representatives or other persons acting on behalf of the aforementioned defendants, including, but not limited to defendants’ attorney.

“Document” means any printed, typewritten or handwritten instrument of whatever character or the physical expression of any means of storage of information and includes, without limitation, any correspondence, memorandum, agreement, letter, hand or typewritten note, computer printout, computer tape, microfilm, microfiche, tape recording, photograph, motion picture, plat, diagram, survey, voice tapes, recordings, e-mails, any computer communications, or other items of a similar nature, originals and non-identical copies and where original and/or non-identical copies are in existence, a copy of the original and a copy of all non-identical copies.

“Person” or “Persons” includes an actual person, firm, association, organization, partnership, business, trust, corporation or public entity.

“Plaintiff” means the named plaintiff in this lawsuit.

“Vehicle involved in the collision” concerns the vehicle driven by the defendant(s) driver at the time of the collision.

INSTRUCTIONS

1. This discovery is deemed to be continuing and whenever you receive information that would be deemed to supplement these requests, you are hereby required to do so.
2. If any information in this discovery is deemed by you to be privileged, please state the privilege asserted, basic reasons behind the privilege, and enough information to enable plaintiff to brief and/or research the privilege issue.

REQUEST FOR PRODUCTION NO. 1:

Please produce certified copy of all insurance which may be applicable to the allegations in this matter, including all umbrella and all excess coverage, including the declarations page for all policies.

REQUEST FOR PRODUCTION NO. 2:

Please produce a copy of all statements you have taken in this case or which in any way relate to the facts surrounding this case.

REQUEST FOR PRODUCTION NO. 3:

Please produce all accident or investigative reports which were generated as a result of this action or which relate to the facts surrounding this lawsuit.

REQUEST FOR PRODUCTION NO. 4:

Please produce all photos or videotapes related to the plaintiff, the vehicles, the accident and/or this case.

REQUEST FOR PRODUCTION NO. 5:

Please produce all documents related to plaintiff, including but not limited to medical records, criminal records, videotapes, pictures, statements, or work records.

REQUEST FOR PRODUCTION NO. 6:

Please produce all testing results which in any way relate to this case.

REQUEST FOR PRODUCTION NO. 7:

Please produce all exhibits you may or will introduce at the trial of this matter and/or at any hearings.

REQUEST FOR PRODUCTION NO. 8:

Please produce all documents reviewed and/or relied upon by experts you anticipate calling at the trial of this matter.

REQUEST FOR PRODUCTION NO. 9:

Please produce any Mary Carter Agreements or similar agreements relating to indemnity, settlement, or sharing of expenses and/or judgments.

REQUEST FOR PRODUCTION NO. 10:

Please produce all expert reports related to this case, companion cases, or similar cases.

REQUEST FOR PRODUCTION NO. 11:

Please produce the employment file, disciplinary file, medical file, if applicable, concerning the driver of the vehicle involved in the collision.

REQUEST FOR PRODUCTION NO. 12:

Please produce the repair history of the vehicle involved in the collision.

REQUEST FOR PRODUCTION NO. 13:

Please produce a copy of any type of disciplinary proceedings, write-up, internal investigation, warning, reprimand, or similar documents which in any way relate to the collision or the driver of the vehicle involved in the collision.

REQUEST FOR PRODUCTION NO. 14:

Please produce all documents you maintain on the vehicle in question, including insurance, recommended repairs, repairs performed, modifications, uses, designated drivers, or any other document which you keep on the vehicle involved in the collision.

REQUEST FOR PRODUCTION NO. 15:

Please produce all damage estimates on all vehicles involved in the collision at issue in this case.

REQUEST FOR PRODUCTION NO. 16:

Please produce any and all documents identified in your Answers to Interrogatories.

REQUEST FOR PRODUCTION NO. 17:

Please produce any and all cell phone logs, records, bills and/or any other similar documentation for the day of the subject accident on all personal and/or company cell phones identified in Answer to Interrogatory No. 35.

REQUEST FOR PRODUCTION NO. 18:

Please produce any and all drug or alcohol tests performed on the driver of the vehicle involved in the collision on the day of the subject accident.

THUS DONE AND SIGNED at Lake Charles, Louisiana this 28th day of September, 2021.

By His Attorneys,

BAGGETT, McCALL, BURGESS,
WATSON, GAUGHAN & ANDRUS, LLC

By:

ERIN M. ALLEY #23214

3006 Country Club Road
P.O. Drawer 7820
Lake Charles, Louisiana 70606-7820
Telephone: 337-478-8888
Facsimile: 337-478-8946
Email: ealley@baggettmccall.com

LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet – LA. R.S. 13:4688 and
Part G §13, Louisiana Supreme Court General Administrative Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption: **WILLIAM LANGLEY**
vs. BERKSHIRE HATHAWAY DIRECT INSURANCE COMPANY,
FAST LANE LOGISTICS and KEITH TERRELL HOWARD

Court: 14th Judicial District Court Docket No.: 2021-4149 D

Parish: Calcasieu Parish Filing Date: SEP 28 2021

Name of Lead Petitioner's Attorney: ERIN M. ALLEY

Name of Self-Represented Litigant: _____

Number of Named petitioners: 1 Number of Named defendants: 3

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

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Auto: Personal Injury
 Auto: Wrongful Death
 Asbestos: Property Damage
 Product Liability
 Intentional Bodily Injury
 Intentional Wrongful Death
 Business Tort
 Defamation
 Environmental Tort
 Intellectual Property
 Legal Malpractice
 Other Professional Malpractice
 Maritime
 Wrongful Death
 General Negligence

Auto: Property Damage
 Auto: Uninsured Motorist
 Asbestos: Personal Injury/Death
 Premise Liability
 Intentional Property Damage
 Unfair Business Practice
 Fraud
 Professional Negligence
 Medical-Malpractice
 Toxic Tort
 Other Tort (describe below)
 Redhibition
 Class Action (nature of case)

Please briefly describe the nature of the litigation in one sentence of additional detail:
Motor Vehicle Accident

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:

Erin M. Alley

Erin M. Alley
 Baggett, McCall, Burgess, Watson & Gaughan, LLC
 P.O. Drawer 7820
 Lake Charles, Louisiana 70606-7820
 (T) (337) 478-8888
 (F) (337) 478-8946
 (E) ealley@baggettmccall.com



C M S 7 6 8 8 8 5 7
 Filing Date: 09/28/2021 12:00 AM Page Count: 1
 Case Number: 2021-004149
 Document Name: Damages - Supreme Court Form

WILLIAM Langley
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY
THROUGH ITS AGENT FOR
SERVICE OF LEGAL PROCESS:
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

Parish of East Baton Rouge, Louisiana, Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand contained in the petition of WILLIAM Langley, (PETITION FOR DAMAGES) against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within fifteen (15) days after the service hereof, under penalty of default.

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 28th day of September 2021.

Issued and delivered October 29, 2021

Annette Borel
Annette Borel

Deputy Clerk of Court

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SERVICE INFORMATION

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20____

SERVICE \$ _____ BY: _____

MILEAGE \$ _____ Deputy Sheriff

TOTAL \$ _____

Party No. P001



C M S 7 7 3 8 5 8 7
Filing Date: 10/29/2021 09:35 AM Page Count: 1
Case Number: 2021-004149
Document Name: 1600 Citation

You Are Hereby Notified - Civil

WILLIAM LANGLEY
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY
THROUGH ITS AGENT FOR
SERVICE OF LEGAL PROCESS:
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

YOU ARE HEREBY NOTIFIED:

TO COMPLY WITH "INTERROGATORIES" AND "REQUEST FOR PRODUCTION OF DOCUMENTS"
WITHIN THE DELAYS PROVIDED HEREIN.

ALL IN ACCORDANCE WITH THE CERTIFIED COPY ATTACHED HERETO AND MADE A PART
HEREOF

Witness the Honorable Judge of said Court, at Lake Charles, Louisiana, this 28TH day of SEPTEMBER 2021.

Issued and delivered October 29, 2021

Annette Borel
Annette Borel
Deputy Clerk of Court

SERVICE INFORMATION

P10

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the
above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile
in the parish in the hands of _____, a person apparently over the age of seventeen years, living
and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said
person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20_____

SERVICE \$ _____ BY: _____
MILEAGE \$ _____ Deputy Sheriff

TOTAL \$ _____

Party No. P001



C M S 7 7 3 8 5 9 2
Filing Date: 10/29/2021 09:37 AM Page Count: 1
Case Number: 2021-004149
Document Name: 2004 You are Hereby Notified - Civil

WILLIAM LANGLEY
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY

Citation/Long Arm



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: FAST LANE LOGISTICS PURSUANT TO LOUISIANA
THROUGH ITS AGENT FOR SERVICE LONG-ARM STATUTE
OF LEGAL PROCESS: TANYA
RODRIGUEZ
55 LA JOLLA CIRCLE
MONTGOMERY, TX 77356

Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand in the petition of WILLIAM LANGLEY against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within thirty (30) days after the service hereof, under penalty of default.

(PETITION FOR DAMAGES)

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 28TH day of SEPTEMBER 2021.

Issued and delivered October 29, 2021

Annette Borel

Annette Borel

Deputy Clerk of Court

*Put in
attn:
Borel
10-29-21
AB*

SERVICE INFORMATION

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20_____

SERVICE \$ _____

BY: _____

MILEAGE \$ _____

Deputy Sheriff

TOTAL \$ _____

Party No. P001



C M S 7 7 3 8 6 0 5
Filing Date: 10/29/2021 09:41 AM Page Count: 1
Case Number: 2021-004149
Document Name: 1602 Citation/Long Arm

WILLIAM LANGLEY
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY

You Are Hereby Notified - Civil



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: FAST LANE LOGISTICS
THROUGH ITS AGENT FOR
SERVICE OF LEGAL PROCESS:
TANYA RODRIGUEZ
55 LA JOLLA CIRCLE
MONTGOMERY, TX 77356

PURSUANT TO LOUISIANA
LONG-ARM STATUTE

YOU ARE HEREBY NOTIFIED:

TO COMPLY WITH "INTERROGATORIES" AND "REQUEST FOR PRODUCTION OF DOCUMENTS"
WITHIN THE DELAYS PROVIDED HEREIN.

ALL IN ACCORDANCE WITH THE CERTIFIED COPY ATTACHED HERETO AND MADE A PART
HEREOF

Witness the Honorable Judge of said Court, at Lake Charles, Louisiana, this 28TH day of SEPTEMBER 2021.

Issued and delivered October 29, 2021

Annette Borel
Annette Borel
Deputy Clerk of Court

*Placed in
Attn:
Borel
10-29-21
AB*

SERVICE INFORMATION

P21

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the
above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile
in the parish in the hands of _____, a person apparently over the age of seventeen years, living
and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said
person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20_____

SERVICE \$ _____ BY: _____

MILEAGE \$ _____ Deputy Sheriff

TOTAL \$ _____

Party No. P001



C M S 7 7 3 8 6 1 1
Filing Date: 10/29/2021 09:42 AM Page Count: 1

Case Number: 2021-004149

Document Name: 2004 You are Hereby Notified - Civil

WILLIAM LANGLEY
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY

Citation/Long Arm



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: KEITH TERRELL HOWARD
3502 ROSS STREET
MANVEL, TX 77578

PURSUANT TO LOUISIANA
LONG-ARM STATUTE

Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand in the petition of WILLIAM LANGLEY against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within thirty (30) days after the service hereof, under penalty of default.

(PETITION FOR DAMAGES)

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 28TH day of SEPTEMBER 2021.

Issued and delivered October 29, 2021

Annette Borel

Deputy Clerk of Court

placed
in
box
Borel
10.29.21
AB

SERVICE INFORMATION

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service. RETURNED:

PARISH OF _____ this _____ day of _____ 20____

SERVICE \$ _____ BY: _____

MILEAGE \$ _____ Deputy Sheriff

TOTAL \$ _____

Party No. P001



WILLIAM LANGLEY
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY

You Are Hereby Notified - Civil



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: KEITH TERRELL HOWARD
3502 ROSS STREET
MANVEL, TX 77578

PURSUANT TO LOUISIANA
LONG-ARM STATUTE

YOU ARE HEREBY NOTIFIED:

TO COMPLY WITH "INTERROGATORIES" AND "REQUEST FOR PRODUCTION OF DOCUMENTS" WITHIN THE DELAYS PROVIDED HEREIN.

ALL IN ACCORDANCE WITH THE CERTIFIED COPY ATTACHED HERETO AND MADE A PART HEREOF

Witness the Honorable Judge of said Court, at Lake Charles, Louisiana, this 28TH day of SEPTEMBER 2021.

Issued and delivered October 29, 2021

Annette Borel

Annette Borel
Deputy Clerk of Court

*Placed in
PMT by Borel
10-29-21
OB*

SERVICE INFORMATION

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20_____

SERVICE \$ _____ BY: _____

MILEAGE \$ _____ Deputy Sheriff

TOTAL \$ _____

Party No. P001



You Are Hereby Notified - Civil

WILLIAM LANGLEY
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY
THROUGH ITS AGENT FOR
SERVICE OF LEGAL PROCESS:
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

YOU ARE HEREBY NOTIFIED:

TO COMPLY WITH "INTERROGATORIES" AND "REQUEST FOR PRODUCTION OF DOCUMENTS" WITHIN THE DELAYS PROVIDED HEREIN.

ALL IN ACCORDANCE WITH THE CERTIFIED COPY ATTACHED HERETO AND MADE A PART HEREOF

Witness the Honorable Judge of said Court, at Lake Charles, Louisiana, this 28TH day of SEPTEMBER 2021.

Issued and delivered October 29, 2021

NOV 16 2021
FILED
Julie Kress

Deputy Clerk of Court
Calcasieu Parish, Louisiana

made service on the named party through the

Office of the Secretary of State on

NOV 09 2021

by tendering a copy of this document to
JULIE NESBITT

DY. M. LOCKWOOD #0503

PRODUCTION OF DOCUMENTS

Annette Borel
Annette Borel
Deputy Clerk of Court

SERVICE INFORMATION

P24

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20_____

SERVICE \$ _____ BY: _____

MILEAGE \$ _____ Deputy Sheriff

TOTAL \$ _____

Party No. P001



C M S 7 7 3 8 5 9 2
Filing Date: 10/29/2021 09:37 AM Page Count: 1
Case Number: 2021-004149
Document Name: 2004 You are Hereby Notified - Civil

WILLIAM LANGLEY
VS. 2021-004149
BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: BERKSHIRE HATHAWAY DIRECT
INSURANCE COMPANY
THROUGH ITS AGENT FOR
SERVICE OF LEGAL PROCESS:
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

NOV 16 2021
FILED *Julie Mesquit*

Deputy Clerk of Court
Calcasieu Parish, Louisiana

Parish of East Baton Rouge, Louisiana, Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand contained in the petition of WILLIAM LANGLEY, (PETITION FOR DAMAGES) against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within fifteen (15) days after the service hereof, under penalty of default.

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 28th day of September 2021.

Issued and delivered October 29, 2021

Annette Borel
Annette Borel

Deputy Clerk of Court

P25

SERVICE INFORMATION

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20_____

SERVICE \$ _____ BY: _____

MILEAGE \$ _____ Deputy Sheriff

TOTAL \$ _____ *(Signature)*

Party No. P001

I made service on the named party through the

Office of the Secretary of State on

NOV 09 2021

by tendering a copy of this document to:

JULIE MESQUIT

M. M. LOCKWOOD #0603

Deputy Sheriff, Parish of East Baton Rouge, LA

